

JONATHAN O. PENA, ESQ.
CA Bar ID No. 278044
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 559-412-5390
Fax: 866-282-6709
info@jonathanpena.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Selene Britney Michelle,)	Case No. 3:23-cv-03478-LJC
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	
Kilolo Kijakazi, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from October 11, 2023 to December 11, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. For the weeks of October 9, 2023 and October 16, 2023,

1 Counsel currently has 8 merit brief and 3 reply briefs due. Counsel requires
2 additional time to brief the issues thoroughly for the Court's consideration.
3 Defendant does not oppose the requested extension. Counsel apologizes to the
4 Defendant and Court for any inconvenience this may cause.

5
6 Respectfully submitted,

7 Dated: October 9, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

8
9 By: /s/ Jonathan Omar Pena
10 JONATHAN OMAR PENA
11 Attorneys for Plaintiff

12
13 Dated: October 9, 2023

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation
Social Security Administration

18
19 By: */s/ Erin Highland
20 Erin Highland
21 Special Assistant United States Attorney
22 Attorneys for Defendant
23 (*As authorized by email on October 4, 2023)
24
25
26
27
28

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: October 10, 2023



HON. LISA J. CISNEROS
UNITED STATES MAGISTRATE JUDGE